

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-21 are currently pending, Claims 1-19 having been amended, and Claims 20-21 having been added. The changes and additions to the claims do not add new matter and are supported by the originally filed specification, for example, on page 30, line 16 to page 32, lines 21; page 26, lines 17-20; and page 27, lines 16-19.

In the outstanding Office Action, Claims 15-16 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter; Claims 15-16 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement; Claims 15-16 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite; and Claims 1-14 and 17-19 were rejected under 35 U.S.C. 102(e) as being anticipated by Okagawa et al. (U.S. Patent No. 6,958,988, hereafter “Okagawa”).

With respect to the rejection of Claims 15-16 under 35 U.S.C. §101 as being directed to non-statutory subject matter, Applicants respectfully submit that the amendment to Claims 15-16, reciting a router within a single statutory class, overcomes this ground of rejection.

With respect to the rejection of Claims 15-16 under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement, Applicants respectfully submit that the amendment to Claims 15-16, reciting a router, overcomes this ground of rejection. Support for the features recited in Claims 15-16 can be found in the originally filed specification, for example, on page 26, lines 17-20; and page 27, lines 16-19.

With respect to the rejection of Claims 15-16 under 35 U.S.C. §112, second paragraph, as being indefinite, Applicants respectfully submit that the amendment to Claims 15-16, which clearly recite a router, overcomes this ground of rejection.

With respect to the rejection of Claim 1 under 35 U.S.C. 102(e), Applicants respectfully submit that the amendment to Claim 1 overcomes this ground of rejection.

Amended Claim 1 recites, *inter alia*,

wherein the source router comprises:

an address converter configured to delete the host address of the destination mobile terminal which is included in a packet received from the source mobile terminal as a destination address, and add the routing address of the destination mobile terminal which is associated with the host address of the destination mobile terminal in the first address memory to the packet;

and wherein the destination router comprises:

an address converter configured to delete the routing address of the destination mobile terminal which is included in the received packet as a destination address, and add the host address of the destination mobile terminal which is associated with the routing address of the destination mobile terminal in the second address memory to the packet.

Support for these features can be found on at least page 30, line 16 to page 32, lines 21, which describes an address converter in a source router and a destination router converting an address of an IP packet from a host address to a routing address and vice versa. The specification further describes that the source router does not perform encapsulation of the IP packet so as to avoid increasing the overhead of the IP packet (see page 32, lines 18-21). Applicants submit that this clearly shows that the “conversion” described in the specification refers to deleting a host address and adding a routing address, as opposed to encapsulating a packet without deleting a first IP address.

Applicants respectfully submit that Okagawa fails to disclose or suggest at least these features of Claim 1.

Figure 1 of Okagawa shows data-delivery server 101, gate node 102, repeater nodes 103-104, edge nodes 105-108, location information server 100, and mobile station 109.

Okagawa describes a mobile communications network for transmitting a packet from a data delivery server 101 to a mobile station 109 via a gate node 102 and an edge node 105 (see Figure 1).

In Okagawa, gate node 102 stores the IP address of mobile station 109 that is associated with the IP address of edge node 105 in accordance with an instruction from location information server 100 (see col. 7, lines 38-46 and Figure 2). Gate node 102 adds the IP address of edge node 105 to the packet received from data delivery server 101. In other words, it encapsulates the received packet for mobile station 109 into the packet for the edge node 105 without converting the IP address of mobile station 109 (see col. 7, lines 11-14 and Figure 2). The gate node 102 routes the received packet to edge node 105, which is connected to mobile station 109, in accordance with the added IP address of edge node 105 (see col. 7, lines 14-15 and Figure 2). Edge node 105 deletes the IP address of edge node 105 which was added by gate node 102. In other words, edge node 105 extracts the encapsulated packet for mobile station 109 without converting an address (see col. 8, lines 3-5 and Figure 2). Edge node 105 transfers the extracted packet to mobile station 109 (see col. 8, lines 6-8 and Figure 2).

Thus, Okagawa describes that gate node 102 *encapsulates* the received packet for the mobile station 109 into the packet for the edge node 105. Therefore, in Okagawa, the packet to which the IP address of the edge node 105 is added still includes the IP address of the destination mobile station 109. Thus, unlike the system defined by Claim 1, Okagawa fails to reduce the overhead of a packet caused by encapsulation of the packet.

Furthermore, the Office Action acknowledges that Okagawa describes encapsulating a packet and that the encapsulated packet still includes the IP address of the destination mobile station 109 (see page 13 of Office Action).

Therefore, Okagawa fails to disclose or suggest an address converter configured to delete the first address of the destination mobile terminal which is included in a packet received from the source mobile terminal as a destination address, and add the second address of the destination mobile terminal which is associated with the first address of the destination mobile terminal in the first address memory to the packet, as defined in Claim 1.

Additionally, Okagawa describes that edge node 105 *extracts* the encapsulated packet for the mobile station 109. Extracting an encapsulated packet is not the same as deleting a second address of the destination mobile terminal and adding a first address of the destination mobile terminal because the extracted IP address of mobile station 109 was already in the packet received at edge node 105.

Therefore, Okagawa fails to disclose or suggest an address converter configured to delete the second address of the destination mobile terminal which is included in the received packet as a destination address, and add the first address of the destination mobile terminal which is associated with the second address of the destination mobile terminal in the second address memory to the packet, as defined in Claim 1.

Thus, it is respectfully submitted that amended Claim 1 (and all associated dependent claims) patentably distinguishes over Okagawa.

Independent Claims 7, 11, 13, and 15-16 recite features similar to those of amended Claim 1 discussed above. Thus, it is respectfully submitted that Claims 7, 11, 13, and 15-16 (and all associated dependent claims) patentably distinguish over Okagawa.

Furthermore, Claim 1 recites, *inter alia*,

wherein the server comprises:...

an instructor configured to instruct a source router connected to a source mobile terminal via a radio circuit and a destination router connected to the destination mobile terminal via a radio circuit to store the first address of the destination mobile terminal associated with the second address of the destination mobile terminal.

In Okagawa, the location information server 100 manages the IP address of mobile station 109 associated with the IP address of edge node 105, which is supervising the area by the mobile station 109 (see col. 7, lines 4-6). Location information server 100 instructs gate node 102, which acts as a source router, to store the IP address of mobile station 109, but it does not instruct the edge node 105, which acts as a destination router, to store the IP address of mobile station 109 (see col. 7, lines 10-11). In Okagawa, edge node 105 extracts the encapsulated packet for mobile station 109, and therefore, it does not need to perform a conversion on the destination address included in the packet based on stored data.

The Office Action takes the position that in Okagawa, the location information server 100 does instruct edge node 105 (the destination router) to store the IP address of mobile station 109 (see Office Action, at page 15). However, the portion of Okagawa cited by the Examiner only discusses “*after the mobile station 109 performs a handover from the edge node 105 to the edge node 106, the mobile station 109 instructs the edge node 105 to store the IP address of the mobile station 109 and IP address of the new edge node in associating with each other.*” (See col. 9, lines 65-67, emphasis added).

Here, in the above case, due to the handover, the mobile station 109 has already connected to the edge node 106 and is not connected to the edge node 105 anymore. That is, in the above case, at the time of the “instructing,” a destination router connected to the destination mobile station 109 is the edge node 106, and is no longer the edge node 105 as asserted in the Office Action.

Therefore, the portion of Okagawa cited by the Examiner fails to disclose or suggest “an instructor configured to instruct a source router connected to a source mobile terminal via a radio circuit and *a destination router connected to the destination mobile terminal* via a radio circuit to store the first address of the destination mobile terminal associated with the second address of the destination mobile terminal,” as defined by Claim 1.

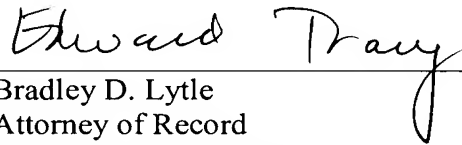
Further, the portion of Okagawa cited by the Examiner only discusses “the mobile station 109 instructs the edge node 105,” but fails to disclose or suggest that *the server* includes an instructor that instructs edge node 105, as required by Claim 1.

Independent Claims 7, 8 recite features similar to those of amended Claim 1 discussed above. Thus, it is respectfully submitted that Claims 1, 7, and 8 (and all associated dependent claims) patentably distinguish over Okagawa, for at least the foregoing reasons.

Consequently, in light of the above discussion and in view of the present amendment, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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